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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 22-CR-155 CRB
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	SEPTEMBER 21, 2022 TO DECEMBER 7, 2022
v.)	AND [PROPOSED] ORDER
)	
JASON DEAN COSTANZA,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Jason Dean Costanza, that time be excluded under the Speedy Trial Act from September 21, 2022 through December 7, 2022.

On September 8, 2022, at the request of the parties, the Court vacated the status conference in the above-referenced matter set for September 21, 2022 and continued this status conference to December 7, 2022. The government and counsel for the defendant stipulate and agree that time be excluded under the Speedy Trial Act so that defense counsel may continue to prepare, including by reviewing the discovery. For this reason, the parties stipulate and agree that excluding time until December 7, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from September 21, 2022

1 through December 7, 2022 from computation under the Speedy Trial Act outweigh the best interests of
2 the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5
6 IT IS SO STIPULATED.

7 DATED: 9/12/2022

/s/
KRISTINA GREEN
Assistant United States Attorney

9 DATED: 9/12/2022

/s/
GAIL SHIFMAN
Counsel for Defendant Jason Dean Costanza

11
12 **~~[PROPOSED]~~ ORDER**

13 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
14 Court finds that failing to exclude the time from September 21, 2022 through December 7, 2022 would
15 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
17 Court further finds that the ends of justice served by excluding the time from September 21, 2022 to
18 December 7, 2022 from computation under the Speedy Trial Act outweigh the best interests of the
19 public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS
20 HEREBY ORDERED that the time from September 21, 2022 through December 7, 2022 shall be
21 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

22 IT IS SO ORDERED.

23
24 DATED: September 23, 2022


HONORABLE CHARLES R. BREYER
United States Senior District Judge